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INTO SECOND

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street, 3rd floor New York, NY 10007

April 29, 2022

By ECF

Honorable Andrew L. Carter, Jr United States Magistrate Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007



Re: Morales v. Comm'r of Soc. Sec., No. 20 Civ. 5274 (ALC)

Dear Judge Carter:

This Office represents Kilolo Kijakazi, the Acting Commissioner of Social Security (the "Commissioner"), the defendant in the above-referenced action brought pursuant to 42 U.S.C. § 405(g), in which the plaintiff challenges a decision to deny her application for Social Security disability benefits.

I respectfully write to request a 30-day extension of time for the Commissioner to file her motion for judgment on the pleadings, from today, April 29, 2022, until May 30, 2022. The extension is needed due to the press of business from a number of other deadlines in Social Security cases, which have delayed my preparation of the Commissioner's cross-motion in this case. I apologize for the lateness of this request, but an extension would enable the Commissioner to present full briefing to the Court concerning the issues raised in this case.

This is the Commissioner's first request for an extension in this case. I attempted to contact the plaintiff, who is appearing *pro se*, on April 28 and April 29, 2022, by telephone at the number listed on the docket, (347) 313-5539, to determine whether she consents to this request for an extension, but I was advised by the person answering this number that this telephone number is no longer associated with the plaintiff.

I thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS United States Attorney

/s/ Amanda F. Parsels

BY: AMANDA F. PARSELS

Assistant United States Attorney

Tel.: (212) 637-2780

Email: amanda.parsels@usdoj.gov

cc: Rose Morales (by U.S. Mail)

Plaintiff Pro Se

Application granted. Pro se plaintiff is directed to provide the Court with an updated telephone number. The Clerk of Court is respectfully directed to send this order to pro se plaintiff.

5/2/22

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE